

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAMAL RAVIKANT,

x

Plaintiff,

- against -

**JOINT SUBMISSION OF STATUS
LETTER**

**CHRISTINE H. ROHDE, M.D., JOSEPH P.
ALUKAL, M.D., JARROD BOGUE, M.D.,
COLUMBIA DOCTORS FACULTY
PRACTICE GROUP OF THE COLUMBIA
UNIVERSITY IRVING MEDICAL CENTER
AND THE NEW YORK AND
PRESBYTERIAN HOSPITAL,**

Civil Action No. 21-CV-04758

**Hon. Magistrate Judge Ona T.
Wang**

Date: November 18, 2022

Defendants.

Dear Hon. Magistrate Judge Wang: _____

We the undersigned represent Plaintiff and Defendants in the above referenced action. This joint status letter is filed pursuant to the directives of the Court's October 4, 2022 Order (ECF Doc. No. 107). Previously, the parties submitted an eleven-page joint status letter on July 8, 2022 (ECF Doc. No. 93), regarding outstanding discovery issues in this action, which is incorporated in its entirety by reference herein. Based upon review of this joint status letter, this Court issued its July 13, 2022 Order (ECF Doc. No. 93) (hereinafter, the "July 13, 2022 Order").

Plaintiff completed its document production and completed testifying in his deposition on November 9, 2022.

The four named individual defendants' depositions are scheduled to be completed in December as follows:

Joseph P. Alukal, M.D.	December 15, 2022
Christine Rodhe, M.D.	December 16, 2022
Jennie Rovano, RN	December 21, 2022
Jarrod Bogue, M.D. ¹	December 22, 2022

Plaintiff intends to take the non-party deposition indicated in the previous report, but will meet and confer with defendants' counsel following the December depositions to determine the necessity of each of them. Plaintiff also will be issuing subpoenas to some of the companies previously identified in Plaintiff's submittal on economic damages, and will determine whether depositions of those company personnel will be necessary.

Defendants intend to take the non-party deposition of the plaintiff's brother Naval Ravikant and a further depositions of plaintiff's corporate attorney, Eric Benisek, Esq.²

Defendants will also be seeking the non-party depositions of plaintiff's investors in the Kamal Ravikant Rolling Fund, and potential investors the plaintiff or his agent(s) contacted for the Evolve II/Kamal Ravikant Rolling Fund. Defendants therefore demand a list identifying all potential investors contacted by the plaintiff and/or his agents for the Evolve II/Kamal Ravikant Rolling Fund, and which potential investors joined the Fund, and the contact information of each potential investor or investor of Evolve II/Kamal Ravikant Rolling Fund.

Defendants will also be seeking the non-party depositions of plaintiff's sexual partners since his October 1, 2019 surgery with the Defendants. Accordingly, defendants demand the full names and contact information of each of plaintiff's sexual partners since the October 1, 2019 surgery.

Plaintiffs will provide responses to Defendants' Post Deposition Demand for Authorizations served on November 18, 2022.

¹ Plaintiff's counsel had advised they will stipulate to discontinue Dr. Bogue from the action with prejudice, on the condition that he appears for deposition.

² Mr. Benisek is the plaintiff's corporate counsel for his various endeavors. He was previously deposed early in this litigation, on September 21, 2021, per plaintiff's notice of deposition over our objection. Plaintiff stipulated that we would be permitted to call Mr. Benisek for a further deposition later in the litigation, given that discovery relating to plaintiff's lost earnings claim had not yet been completed at the time of his September 21, 2021 deposition.

Defendants will produce any photographs of the plaintiff, while hospitalized or seen by the individual defendants, by November 23, 2022. Defendants will also respond to plaintiff's requests concerning any Doppler study performed by the defendants, by November 28, 2022.

Respectfully submitted,

Aaronson Rappaport Feinstein and Deutsch, LLP by:

s/Nanor LT Bahadurian

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s/ **Richard C. Vasquez**

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